

**Fair Political Practices Commission**  
**MEMORANDUM**

To: Chairman Johnson and Commissioners Hodson, Huguenin, Leidigh, and Remy

From: Michael Salerno, Executive Director

Subject: Adopt Proposed Regulation 18200 -- Definition of "Section" and "Regulation."

Date: September 25, 2007

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**I. EXECUTIVE SUMMARY**

Proposed Commission Action: Adopt Regulation 18200 on definition of "Section" and "Regulation." Since the proposed regulation is a "change without regulatory effect," the Administrative Procedures Act permits the Commission to adopt this proposal without notice through the Office of Administrative Law.

Background: This is the first recommendation from the regulation project currently underway at the Center for State and Local Government Law, UC Hastings College of the Law. It is suggested a regulation be added to the definitions found in the Fair Political Practices Commission regulations to state a reference to "Section" refers to the Government Code, unless otherwise specified and a reference to "Regulation" refers to Division 6 of Title 2 of the California Code of Regulations, unless otherwise specified.

Placing this regulation in the definitions chapter of the Commission's regulations would allow for the elimination of repetitive and otherwise unnecessary wording throughout the regulations and provides a consistent reference to these terms that is currently lacking. If this regulation is adopted, suggestions for the revision of current regulations would incorporate this style as would proposed regulations.